

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE LOUIS TELERICO

Debtor

CASE No. 17-50236

JUDGE ALAN M KOSCHIK

CHAPTER 11

**EMERGENCY AMENDED MOTION OF LOUIS TELERICO TO RESCHEDULE HEARING ON
CONFIRMATION OF PLAN VERSION 1.3 AND RELATED OBJECTIONS AND MOTIONS**

Louis A. Telerico, the debtor and Debtor in Possession in the within bankruptcy case (“Debtor”), moves the Court to reschedule the hearing currently set for August 28, 2108 at 10:00 AM (“Hearing”) on confirmation of the Plan of Reorganization Version 1.3 of the Debtor [Doc.114] (“Plan”) and the following: 1) Amended Objection to Confirmation of Plan (Docket Number 115)¹ [Doc. 123] filed by Bank of America NA; 2) Creditor United States of America’s Objection to Plan Confirmation [Doc. 128]; 3) State of Ohio, Department of Taxation’s Objection to Debtor’s Plan of Reorganization Version 1.3 [Doc. 130]; 4) Treasurer of Portage County, Ohio’s Objection To Disclosure Statement Version 1.3 for Louis a Telerico and Plan Of Reorganization Version 1.3 for Louis a Telerico [Doc.118]; and the 5) Objection of the United States Trustee to Confirmation of Debtor’s Plan of Reorganization [Doc. 131]; 6) Limited Objection to and Reservation of Rights to Plan 1.3 for Louis A. Telerico Filed by Stifel Nicolaus & Company, Inc.(“Stifel”) [Doc. 137] (collectively the “Objections”); 7) Motion of the United States Trustee to Convert Case to a Case Under Chapter 7 or, in the Alternative, to Dismiss Case [Doc. 125] (“Motion to Convert”); and 8) the Debtor’s responses to the Objections and the Motion to Convert [Docs. 138, 139, 140 and 141].

1. Debtor filed this Bankruptcy Case on February 4, 2017 and has continued to operate as Debtor in Possession since that date. No committee of unsecured creditors has been established

¹ BOA’s Objection refers to Doc. 115 the redlined copy of the Plan; the Debtor believes it intended to refer to Doc. 114, the actual Plan itself..

in this case.

2. The Debtor has reached an agreement with Stifel which will require an amendment to the Plan and will result in Stifel voting in favor of the Plan. It may require re-voting the plan

3. All parties who have filed the Objections (and some who have not) have consented to the requested rescheduling of the hearing.

4. The only upcoming dates that are bad for undersigned counsel is September 21-28 when he will be out of the office

THEREFORE, the Debtor respectfully requests that this Court enter an order rescheduling the hearing to an appropriate date in the future.

Respectfully submitted,

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CERTIFICATE OF SERVICE

A copy of this Motion to Reschedule was served on the following on the date filed by Notice of Electronic Filing through the Court's ECF/CM system. (THE UST does not appear on the court's system but does receive all filings in all bankruptcy cases)

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